UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In Re:

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(d)(1)

JOEL J. PEDERSEN AKA JOEL JON PEDERSEN,

Case No. 20-10241-CLB Chapter 13

Debtor.

PLEASE TAKE NOTICE that upon the Motion for Relief from Automatic Stay pursuant to 11 U.S.C. §362(d)(1), of secured creditor, Credit Acceptance Corp., dated June 24, 2021, the undersigned will move at a hearing to be held at United States Bankruptcy Court, Robert H. Jackson U.S. Courthouse, 2 Niagara Square, Buffalo, New York 14202 on July 12, 2021 at 11:30am of that day, or as soon thereafter as counsel can be heard, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such creditor relief from automatic stay; and for such other and further relief as to the Court may seem just and proper.

DATED: June 24, 2021 CREDIT ACCEPTANCE CORP.

By Its Counsel

/s/ Martin A. Mooney
Martin A. Mooney, Esq.
SCHILLER, KNAPP, LEFKOWITZ & HERTZEL, LLP
15 Cornell Road
Latham, New York 12110
Tel (518) 786-9069
E-Mail: MMooney@schillerknapp.com

TO: Julie Philippi 170 Franklin St Suite 600 Buffalo, New York 14202 United States Trustee (Western District of New York) 300 Pearl Street, Suite 401 Buffalo, New York 14202

Joel J. Pedersen 3251 Proctor Road Wellsville, NY 14895

Ronald S. Goldman, Esq. Attorney for Debtor 532 Times Square Building 45 Exchange Street Rochester, NY 14614